

**UNITED STATES DISTRICT COURT FOR  
THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

RAVGEN, INC.,

Plaintiff,

v.

NATERA, INC. AND NSTX, INC.,

Defendants.

**Civil Action No. 1:20-cv-00692-LY**

**JURY TRIAL DEMANDED**

**DECLARATION OF AMANDA L. MAJOR IN SUPPORT OF NATERA.  
INC. AND NSTX. INC.'S MOTION FOR LEAVE TO AMEND THEIR  
ANSWER AND DEFENSES**

I, Amanda L. Major, declare as follows:

1. I am an attorney at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP, counsel for Defendants Natera, Inc. and NSTX, Inc. (collectively “Natera”) in the above captioned matter. I am licensed to practice in New York and Washington, D.C. and am admitted *pro hac vice* in this action.

2. Attached hereto as Exhibit A is a true and accurate copy of Natera’s proposed Second Amended Answer, Defenses, and Counterclaims to Ravgen’s Complaint for Patent Infringement.

3. Attached hereto as Exhibit B is a true and accurate copy of a redline version of Natera’s proposed Second Amended Answer, Defenses, and Counterclaims to Ravgen’s Complaint for Patent Infringement.

4. Attached hereto as Exhibit 1 is a true and accurate annotated copy of the Patent License Agreement between Ravgen Inc. and Thermo Fisher Scientific Inc, dated June 23, 2021.

5. Attached hereto as Exhibit 2 is a true and accurate copy of *Ravgen, Inc. v. Quest Diagnostics Incorporated*, No. 21-9011-RGK-GJS (C.D. Cal. Sept. 26, 2022), Dkt. 449.

6. Attached hereto as Exhibit 3 is a true and accurate copy of the *Ravgen, Inc. v. Quest Diagnostics Incorporated*, No. 21-9011-RGK-GJS (C.D. Cal. Oct. 7, 2022), Dkt. 492.

7. Attached hereto as Exhibit 4 is a true and accurate annotated copy of excerpts from the Expert Report of Paul K. Meyer, dated August 6, 2021.

8. Attached hereto as Exhibit 5 is a true and accurate annotated copy of the Letter to the Honorable Jennifer L. Hall Regarding Defendants’ Request for Leave to Amend their Answers and Counterclaims, submitted in *Ravgen, Inc. v. Illumina, Inc.*, No.

20-1644-RGA-JLH (D. Del. Mar. 16, 2023), *Ravgen, Inc. v. Ariosa Diagnostics, Inc.*, No. 20-1646-RGA-JLH (D. Del. Mar. 16, 2023), and *Ravgen, Inc. v. Biora Therapeutics, Inc.*, No. 20-1734-RGA-JLH (D. Del. Mar. 16, 2023).

9. Attached hereto as Exhibit 6 is a true and accurate copy of excerpts from the transcript of the March 29, 2023 motion hearing held in *Ravgen, Inc. v. Illumina, Inc.*, No. 20-1644-RGA-JLH (D. Del.), *Ravgen, Inc. v. Ariosa Diagnostics, Inc.*, No. 20-1646-RGA-JLH (D. Del.), *Ravgen, Inc. v. Myriad Genetics, Inc.*, No. 20-1730-RGA-JLH (D. Del.), and *Ravgen, Inc. v. Biora Therapeutics, Inc.*, No. 20-1734-RGA-JLH (D. Del.).

10. Attached hereto as Exhibit 7 is a true and accurate copy of the document production correspondence from counsel for Ravgen to counsel for Natera, dated July 7, 2021.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 7, 2023

/s/ Amanda L. Major  
Amanda L. Major